

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE JP MORGAN CHASE & CO. SECURITIES
LITIGATION

This Document Relates to:

Blau v. Harrison, et al., No. 04 C 6592

Hyland v. Harrison, et al., No. 06 C 4675

Hyland v. J.P. Morgan Securities, Inc., No. 06 C 4676

MDL No. 1783

Master Docket No. 06 C 4674

Judge David H. Coar

Magistrate Judge Martin C. Ashman

**PLAINTIFFS' JOINT MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

Lead Plaintiffs in the above-referenced cases, by and through counsel, move for final approval pursuant to Fed. R. Civ. P. 23(e) of the proposed settlement, which is the subject of the Court's July 8, 2008 Order, after conducting the hearing required by Fed. R. Civ. P. 23(e)(1)(C). A true and correct copy of the proposed Stipulation of Settlement is attached hereto as Exhibit A.

In support of this Motion, Lead Plaintiffs rely upon all of their related submissions, all proceedings before this Court, and the accompanying Memorandum of Law.

WHEREFORE, Lead Plaintiffs move for entry of an Order and Final Judgment of Dismissal, in a proposed form to be submitted by the parties, that, *inter alia*, approves the parties' settlement of the claims raised in the above-referenced actions as fair, reasonable and adequate and enters a final judgment.

DATED: September 16, 2008

Respectfully submitted,

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